

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Aimee Davis	:	
	:	
Plaintiff	:	Civil Action – Law
	:	
v.	:	
	:	Jury Trial Demanded
C. Otte, R.N.	:	
Tammy R. Rishel, PA-C	:	No. 4:16-CV-01011
Cynthia Freeland, M.D.	:	
ABC Corp.	:	
John Doe (I-III)	:	
Defendants	:	

CERTIFICATE OF MERIT AS TO ALL DEFENDANTS

I, Susan B. Ayres, Esquire, of Hill & Associates hereby certifies that:

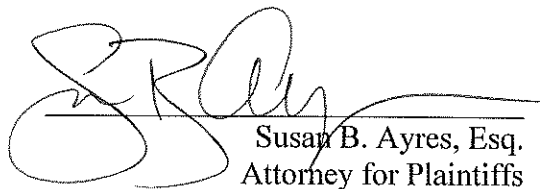
X An appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the named individual defendants in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

The claim that this prison defendant deviated from an acceptable professional standard is based on allegations that other licensed professionals for whom this defendant is responsible deviated from an acceptable professional standard and an appropriate licensed physician has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm:

OR

Expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim of this defendant.


Susan B. Ayres, Esq.
Attorney for Plaintiffs

Date: 5-12-17